

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
WASHINGTON, D.C. 20240  
August 2, 1996

In Reply Refer To:

1703 (360)

EMS TRANSMISSION 8/7/96  
Instruction Memorandum No. 96-155  
Expires: 09/30/97

To: All Washington and Field Officials

From: Director

Subject: Transmittal of Departmental Manual 518 DM 1 and Other Documents

This instruction memorandum transmits the following Department of the Interior documents:

1. Departmental Manual 518 DM 1, Comprehensive Waste Management;
2. A Strategy for Pollution Prevention and Right-to-Know in the U.S. Department of the Interior; and
3. General Guidance on Pollution Prevention and Right-to-Know, Recycling and Green Acquisition.

The waste management policy set forth in 58 DM 1 covers lands and facilities managed by Interior agencies. The policy applies not only to Interior personnel; it also extends to individuals and groups whose activities impact Interior lands. Please advise claimants, concessionaires, contractors, lessees, permittees, and other public land users of these waste management standards.

If you have questions about this instruction memorandum, please call Barbara Morris (WO 360) at (202) 452-5060. She can also be reached through Groupwise e-mail and via the internet at [bmorris@wo0033wp.wo.blm.gov](mailto:bmorris@wo0033wp.wo.blm.gov).

Signed  
Michael H. Schwartz  
Acting Assistant Director  
Resource Use and Protection

Authenticated  
Robert M. Williams  
Directives Team, WO530

3 Attachments

1--Departmental Manual 518 DM 1, Comprehensive Waste Management (2 pp)

- 2--A Strategy for Pollution Prevention and Right-to-Know in the U.S. Department of the Interior (2 pp)
- 3--General Guidance on Pollution Prevention and Right-to-Know, Recycling and Green Acquisition (15 pp)

**Attachment 2**

DEPARTMENT OF THE INTERIOR  
**DEPARTMENTAL MANUAL**

Environmental Quality Programs      Part 518 Waste Management

Chapter 1 Comprehensive Waste Management      518 DM 1.1

1.1      Purpose. This chapter prescribes Departmental policy, responsibilities, and functions regarding management of wastes on Departmental lands and facilities through improved awareness, program management, and accountability. The Department has major responsibility for the management and control of waste on Departmental lands and facilities, and associated response actions, in compliance with applicable statutes and regulations.

1.2      Scope. The responsibilities and requirements made applicable to comprehensive waste management by this chapter shall apply to all Departmentally managed lands and facilities. This includes working with non-governmental groups whose activities impact Departmental lands and facilities (e.g., claimants, concessionaires, contractors, permittees, and lessees). For purposes of this chapter, sites on Indian trust lands are not included.

1.3      Definition. In this chapter, the term waste is defined to include solid and hazardous waste, hazardous materials, and hazardous substances under the references listed in Section 1.4 of this chapter.

1.4      References. In terms of comprehensive waste management for the Department, the following statutes are referenced. The Comprehensive Environmental Response, Compensation and Liability Act, as amended by the Superfund Amendments and Reauthorization Act (42 U.S.C. 9601 et. seq.); Clean Air Act, (42 U.S.C. 7401-7671q), as amended; Clean Water Act, (33 U.S.C. 1251 et. seq.), as amended; Federal Facility Compliance Act, (42 U.S.C. 6903, 6908, 6924, 6927, 6939 c-e, 6961, 6965); Hazardous Materials Transportation Act, (49 U.S.C. 1801-1812), Pollution Prevention Act, (42 U.S.C. 13101 et. seq.); and, the Resource Conservation and Recovery Act, (42 U.S.C. 6901 et. seq.); Solid Waste Disposal Act, (42 U.S.C. 6901 et. seq.); Toxic Substances Control Act, (42 U.S.C. 2601 et. seq.); and the Safe Drinking Water Act, (42 U.S.C. 300 f-j 26).

1.5      Policy. Comprehensive waste management for Departmental lands and facilities will be based upon the following four principles:

A. Wherever feasible, the Department will seek to prevent the generation and acquisition of hazardous wastes.

DEPARTMENT OF THE INTERIOR  
**DEPARTMENTAL MANUAL**

Environmental Quality Programs      Part 518 Waste Management

Chapter 1 Comprehensive Waste Management                      518 DM 1.5

B. Whenever waste generation is unavoidable, the Department will work to reduce the amounts (toxicity or risk) generated through the use of sound waste management practices.

C. The Department will manage waste materials responsibly to protect not only the resources entrusted to it, but the many people who live and work on Departmental managed lands, and those who enjoy those lands and facilities each year.

D. Wherever feasible, the Department will move aggressively to clean up and restore areas under its care that are contaminated by pollution.

1.6      Responsibilities.

A. Assistant Secretaries. All Assistant Secretaries will direct bureaus and offices under their jurisdiction to implement comprehensive waste management using the above four principles.

B. Assistant Secretary - Policy, Management and Budget. The Assistant Secretary - Policy, Management and Budget, through the Office of Environmental Policy and Compliance, is responsible for oversight of Departmental compliance with 518 DM 1.

C. The Advisory Group on Environmental Policy and Compliance. The Advisory Group on Environmental Policy and Compliance is responsible for policy guidance under 518 DM 1.

D. Office of Environmental Policy and Compliance. The Office of Environmental Policy and Compliance is responsible for oversight and issuing guidance and instruction to implement 518 DM.

E. Heads of Departmental Bureaus and Offices. Heads of Departmental bureaus and offices having responsibility for waste management under their jurisdiction, will implement comprehensive waste management using the above four principles. In addition, within their scope of authority, adequate program support is to be ensured in terms of resources and budget.

*A Strategy for  
Pollution Prevention and Right-to-Know  
in the  
U.S. Department of the Interior*

**POLICY**

The Department of the Interior (DOI) will pursue a hierarchical approach to overall pollution prevention (P2) starting with source reduction to reduce the amount of pollutants entering the waste stream. Where feasible, DOI will: substitute non-toxic hazardous materials in the production, acquisition and/or use of materials; redesign products, processes and practices to reduce environmental impacts; reuse or recycle materials and wastes; reduce the release of and transfer of toxic chemicals and pollutants; and, practice conservation of, or increase the efficiency in, the use of energy, water, raw materials and other natural resources.

**RESPONSIBILITIES**

In Part 518 of the Departmental Manual, Chapter 1, "Comprehensive Waste Management", dated March 3, 1994, the Secretary of the Interior identifies pollution prevention as the primary means for managing DOI's waste activities on **all Departmentally-managed lands and facilities** and supports the adoption of the following environmental protection hierarchy:

- ! Pollution should be prevented or reduced at the source
- ! Pollution that cannot be prevented should be recycled in an environmentally safe manner
- ! Pollution that cannot be prevented, reused or recycled should be treated in an environmentally safe manner
- ! Disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner

The **Director, Office of Environmental Policy and Compliance** of DOI, is the senior agency manager responsible for coordinating pollution prevention efforts, including compliance with, and oversight of, Executive Order 12856.

**The Office of Environmental Policy and Compliance** will provide guidance to DOI bureaus and offices on pollution prevention.

**The Office of Acquisition and Property Management** will provide general guidance on the acquisition of environmentally preferred products.

**Each Departmental bureau and office** is responsible for compliance with the requirements of Executive Order 12856, including the development of facility plans, reporting requirements, toxic reductions, review of specifications and other standardized documents, and changes in acquisition procedures.

**Each EPCRA-defined facility** is responsible for reporting releases and off-site transfers as part of the Toxic Release Inventory (TRI) by **July 1, 1995**, and develop a pollution prevention plan by **December 31, 1995**.

**Each Departmental bureau and office** will develop a baseline for measuring reductions in toxic chemicals or pollutants using base data no later than 1994.

**Each Departmental bureau and office** is responsible for outlining plans for disseminating pollution prevention techniques and approaches internally through training, and externally in making pollution prevention reports, strategies, and plans available to the public. **Individual facilities** are responsible for implementing their respective bureau/office pollution prevention plans.

## **GOALS**

DOI is committed to voluntarily reducing by 1999, releases and transfers of toxic chemicals, as specified in section 313 of the Community Right-To-Know Act (EPCRA), and to reducing toxic pollutants. **Bureaus and Offices** are responsible for setting internal timetables to reach these goals.

DOI is committed to both public involvement, community awareness and environmental justice considerations in the development of its pollution prevention strategy in meeting the requirements of Executive Order 12856.

## **RESOURCE POINTS**

Primary resources for guidance on Executive Order 12856 are:

**"Pollution Prevention in the General Government: Guide for Developing Pollution Prevention Strategies for Executive Order 12856 and Beyond"** EPA 300-B-94-007, April 1994. Copies are available at each bureau headquarters environmental office.

**"Federal Facility Pollution Prevention Planning Guide"** EPA-300-B-94-013, December, 1994. Copies provided to every bureau headquarters environmental office and each DOI "EPCRA-defined" facility.

**"DOI General Guidance on Pollution Prevention and Right-to Know, Recycling and "Green" Acquisition"** Copies are available at each bureau headquarters environmental office.

**U.S. Department of the Interior**

**General Guidance on  
Pollution Prevention and Right-to-Know, Recycling  
and Green Acquisition**

**Prepared in response to**

**Executive Order 12856, "Federal Compliance with Right-To-Know Laws  
and Pollution Prevention Requirements"**

**and**

**Executive Order 12873, "Federal Acquisition, Recycling, and Waste  
Prevention"**

**June 1995**

## INTRODUCTION

The U.S. Department of the Interior (DOI) has prepared its pollution prevention and right-to-know strategy and general guidance on pollution prevention and right-to-know, recycling, and green acquisition, in response to Executive Order 12856 entitled "Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements." This general guidance represents DOI's commitment to the sound management and treatment of solid and hazardous waste and other pollutants on DOI managed lands and facilities. It is embodied in DOI's hierarchical approach to waste management (pollution prevention, waste reduction, waste management, and cleanup and restoration). Additionally, this commitment is also reflected in both recycling and purchasing of environmentally preferred products and services (green acquisition). This guidance will assist the bureaus in carrying out the recycling, waste reduction, green procurement and community right-to-know concerns.

## GENERAL GUIDANCE

The pollution prevention and right-to-know strategy and guidance on pollution prevention and right-to-know, recycling, and green acquisition, apply to all DOI bureaus and offices. The general requirements of Executive Order 12856 are summarized in Table 1 and the requirements for Federal agencies and facilities are summarized in Table 2. A summary of requirements under the Emergency Planning and Community Right-to-Know Act (EPCRA) and the Pollution Prevention Act is provided in Table 3.

### **Roles and Responsibilities in DOI Pollution Prevention and Right-to-Know, Recycling, and Green Acquisition Program**

- ! The Office of Environmental Policy and Compliance (PEP) and the Office of Acquisition and Property Management (PAM) will review and, where necessary, update the recycling, pollution prevention, and green acquisition policy and guidance every two years or whenever regulatory or policy changes necessitate revisions.

! ! DOI bureaus and offices will establish policies, assign responsibilities, delegate authority, and monitor progress in developing, implementing, managing, monitoring, and evaluating pollution prevention (P2) and source reduction (SR) strategies and plans within that organization. For facilities covered under ( i.e., in accordance with E.O. 12856. these facilities are subject to Section 302, 304, 311/312, and/or 313 of EPCRA, as modified by Section 3-304(b) of E.O. All Bureaus are encouraged to develop and follow P2/SR plans to achieve the goals of this strategy. A single individual will normally be designated as the overall coordinator for P2/SR efforts within each bureau.





!! PAM, PEP, and bureaus and offices will establish voluntary goal of 50 percent reductions in releases and off-site transfers of toxic chemicals or toxic pollutants from its covered facilities, as defined in Section 1-102 of E.O. 12856, by December 31, 1999.

!! Bureaus and offices are also encouraged to develop their own policies and programs that meet and/or exceed DOI goals and that support bureau and office mandates and mission. Bureaus and offices have responsibilities for developing additional policies and guidance that would bring them into compliance with environmental laws, EO's, and DOI policies.

- ! Each bureau and office will designate a program coordinator who will be responsible for coordinating their recycling, waste prevention, pollution prevention programs and with community right-to-know groups. Also, to confer with PEP on matters concerning P2, EPCRA, recycling and with PAM on matters concerning acquisition of environmentally preferred products and services, and reporting on bureau and office acquisition achievements.

!! Coordinators will prepare a list of responsibilities and authorities for designing, implementing, managing, monitoring, and evaluating P2/SR strategy/plan implementation within the bureau and office and with community right-to-know groups.

!! DOI and its bureau and offices must develop a program to promote affirmative acquisition for environmentally preferred products and services in accordance with DOI's interim procurement policy directive (DIAPR 92-1), available from PAM, at (202-208-3433).

!! Bureaus and offices must develop recycling, waste reduction, green acquisition and pollution prevention programs that carry out the requirements and intent of RCRA Section 6002 - Federal Procurement (40 CFR 248-250, 252, and 253); E.O. 12873-Federal Acquisition, Recycling, Waste Prevention; EO 12865-Federal Requirements for Right-To-Know Law and Pollution Prevention Requirements; Public Law 102-486-Energy Policy Act of 1992; EO 12845-Requiring Agencies to Purchase Energy Efficient Computer Equipment; and 518 DM 1, "Comprehensive Waste Management."

!! DOI encourages and promotes the use of non-polluting technologies and waste prevention in the selection of environmentally preferred products and services.

Attachment 3-3

! ! Bureaus and offices should review their procurement practices, specifications, and contracts to ensure that they include the requirements specified in Executive Orders 12843, 12856, 12873, and 12902).

### **Role of Acquisition and Program Functions**

- ! The role of the acquisition office is to ensure performance of all necessary actions for effective contracting, ensuring compliance with terms of the contract, and safeguarding the interests of the United States in its contractual relationships. The role of the program office is to seek and select the products and services that are environmentally preferred and to provide justification, where needed, to the acquisition office for selection of the products and services that are targeted in the EO, DOI, and/or bureau and office goals.

### **REPORTING REQUIREMENTS**

- ! The EO's and RCRA require agencies to report on their level of compliance with green acquisition, recycling, and pollution prevention. DOI is required to gather information on quantities of materials recycled, purchase levels of items that are designated for affirmative acquisition preference and pollution prevention accomplishments. In order to reduce multiple requests for information, DOI has developed a consolidated bureau/office report from which responses to the various external reports can be provided. Bureaus and offices will submit annual progress reports to PAM and PEP on their pollution prevention and recycling actions through an evaluation of their program. A request for the report will be issued under a separate memo.

### **POLLUTION PREVENTION AND RIGHT-TO-KNOW, RECYCLING, AND GREEN ACQUISITION GOALS**

- ! The EO's require that DOI set goals for waste prevention and recycling. DOI's strategy for green acquisition establishes goals on three levels. Level A sets mandatory goals, that are established by law or by the EO's, for all bureaus and offices. Level B goals identify those items that are commonly used throughout DOI and are identified as DOI goals. Level C goals lists items that a bureau and office may identify as bureau specific goals.
- ! DOI's approach for achieving toxic chemical goals will require each bureau facility covered by EPCRA ( 302,303,304,311,312 and 313 ) to develop specific and detailed plans for contributing toward the overall DOI goal of 50 percent reduction of toxic chemical releases or off-site transfers from its facilities by December 31, 1999. Although DOI will attempt to achieve 50 percent

Attachment 3-4

reductions of toxic chemicals by 1999 at each of its facilities covered by EPCRA as a matter of policy and to demonstrate sound environmental leadership principles, it is recognized that the order allows for variations in reductions achieved at individual facilities and the flexibility of achieving the results in the aggregate of all facilities. In achieving these reductions, DOI will emphasize, to the maximum extent possible, source reduction practices. Through this strategy, DOI bureaus and offices will have flexibility in developing programs that will help meet regulatory compliance as well as office and bureaus specific needs.

! ! Each DOI bureau and office will set green acquisition, recycling and waste prevention goals that are attainable by September 1995. Thereafter, each office and bureau will set annual recycling and waste prevention goals. At a minimum, DOI headquarters and bureaus must meet the goals according to the hierarchy set for target products and services and listed in Levels A, B, and C.

! ! Support collection of data to comply with EPCRA.

! ! Each DOI bureau and office will set a goal of achieving a 50 percent reduction in releases and off-site transfers from its aggregate baseline. The baseline level is based on the levels of releases and site transfer productions in 1994. This aggregate baseline will be built up from individual agency and office baselines and reduction goals that are consistent with E.O. 12856.

! ! Each DOI bureau and office will establish the goal of achieving a 50 percent reduction in releases and off-site transfers of toxic chemicals or toxic pollutants from its covered facilities, as defined in Section 1-102 of E.O. 12856, by December 31, 1999.

### **Targeted Products for Green Acquisition**

- ! Targeted products are those materials/items for which affirmative procurement goals are set by E.O., and/or DOI offices/bureaus. The goals can be based on designation of specific items and/or increase in procurement levels (percentage or dollar amount).

#### **Level A Products**

The following Level A products are those that are specifically identified in RCRA Sec. 6002, EO 12873, and EO 12845. DOI and its bureaus and offices must comply with goals set under these requirements.

Attachment 3-5

RCRA\*: Cement and concrete containing fly ash  
Paper and paper products  
Lubricating oils containing re-refined oil  
Retread tires  
Building insulation products

\* Refer to DIAPR 92-1, for requirements affecting Level-A RCRA products.

*Note: The Environmental Protection Agency (EPA) is currently proposing to expand the existing RCRA list and include other products which contain recovered materials.*

EO 12873\*\*:Post consumer recycled paper content

\*\* Refer to EO 12873, Sec. 504, Minimum Content Standard for Printing and Writing Paper

EO 12845:Equipment that meet the Environmental Protection Agency's (EPA's) Energy Star requirements  
Equipment with low-power standby feature

### **Level B Products**

The following Level B products and services are those items that are frequently used throughout DOI. Bureaus and offices should seek products that are made from recycled or reused materials and services that are environmentally preferred, e.g., energy and water conserving, and give procurement preference to those items and services.

DOI:Carpeting  
Building furnishing (includes furniture and electrical and plumbing fixtures and interior finishes, e.g., lights with motion sensors, low flush toilets, recycled plastic panels, etc.)  
Construction material  
Wood products  
Paint  
Mulch/Compost  
Toner cartridge  
Recycled concrete (road base)  
Picnic tables/lumber

### **Level C Products**

The Level C products are bureau and office specific items for which they can set affirmative procurement goals.

### **EPCRA Targets**

! Covered Facilities which meet one or more of the threshold reporting requirements of EPCRA.

! EPCRA Section 302: any extremely hazardous substance (EHS) at or above its threshold planning quantity (TPQ). (40 CFR 355.20).

! EPCRA Section 304: A release of an EHS or hazardous substances at or above a reportable quantity if the facility is one at which a hazardous chemical, as defined by the Occupational Safety and Health Administration, is produced, used, or stored (40 CFR 302.4 and Part 355).

! EPCRA Section 311 and 312: Hazardous chemicals at or above 10,000 pounds and EHS at or above 500 pounds or TPQ, whichever is less (40 CFR 370.20, 370.21, 370.40).

! EPCRA Section 313: 25,000 lbs/yr manufacturing or processing, or 10,000 lbs/yr otherwise using one or more listed toxic chemicals (40 CFR 372.25). As directed by Section 3-304 (b) of E.O. Section 313 applies regardless of Standard Industrial Classification (SIC) code.

### **PROGRAM INFORMATION, TRAINING AND DOI ENVIRONMENTAL ACHIEVEMENT AWARD**

! EPCRA, RCRA, P2, and the EO's are intended to change our way of thinking and the way we do business on a day-to-day basis in the Federal sector. In effect, they are meant to modify behavior which will, given time, lead to a change in the culture of the organizations which comprise the Federal government. By each employee incorporating pollution prevention actions into his/her own sphere of work, DOI will collectively achieve great success towards conserving and protecting our environment.

! PEP has developed a series of 26 pollution prevention fact sheets that provide P2 information and recommendations for eliminating or reducing pollution in specific operations and activities that are conducted throughout DOI. Electronic copies of the fact sheets are available in the PEP Electronic Bulletin Board System P2/Recycling Conference by dialing (202) 208-7119.

Attachment 3-7

! Additional Resources - The Environmental Protection Agency has issued numerous guidance documents which will help offices and bureaus implement pollution prevention

programs in their facilities. EPA also manages the Pollution Prevention Information Clearinghouse (PPIC) where information and documents on P2 may be obtained. PPIC may be contacted by phone: 202/260-1023, fax: 202/260-0178 or by writing to Pollution Prevention Information Clearinghouse, Environmental Protection Agency, PM 211-A, 401 M Street, SW, Washington, D.C. 20460.

- ! The DOI Environmental Achievement Award recognizes exceptional achievement or contribution by bureaus and offices, employees, and contractors in pollution prevention, recycling, waste reduction and acquisition of environmentally preferred products and services.

Attachment 3-8

## GLOSSARY/DEFINITION

**Affirmative acquisition/procurement** - The donating, buying, or purchasing preference to a product over a similar type of product because of certain characteristics or properties. The Executive Order 12873, Federal Acquisition, Recycling and Waste Prevention, requires that Federal agencies give preference to items designated by the Environmental Protection Agency (EPA) in accordance with the Resource Conservation and Recovery Act Section 6002. The following five items have been designated by EPA as items which contain recovered materials: 1) re-refined lubricating oils, 2) paper and paper products, 3) building insulation, 4) concrete and cement containing fly ash, and 5) retread tires.

**Environmentally preferred products and services** - Products or services that are preferred over similar products and services because they exhibit characteristics or properties that have less negative impacts on the environment. These characteristics or properties can include toxicity, energy efficiency, water conservation, recyclability, etc.

**EPCRA** - Emergency Planning and Community Right-To-Know Act; also known as SARA Title III (42 U.S.C. Section 11001-11050; 40 CFR Part 350-372).

**Green Acquisition/Green Procurement** - The purchase of products and services that are considered environmentally preferred.

**Pollution prevention (P2)** - The use of materials, processes, or practices that reduce or eliminate the quantity and/or toxicity of wastes at the source of generation.

**Post-consumer recycled content** - That portion of a recycled product that is derived from materials obtained after the original product was used. Off-specification or selvedge paper from the paper manufacturing plant that were recycled to make new paper **would not** be considered post-consumer. However, that portion of the paper that was used by the consumer, collected, and then recycled to make new paper, **would be** considered post-consumer recycled content.

**Recycling** - The act of producing new products or materials from previous used and collected materials. An example would be where floor carpets are manufactured from previously used and collected plastic jugs.

**Reuse** - The act of reusing a previously used item for another purpose. An example would be to use the backs of discarded paper for notes or messages. After re-use as note paper, the paper can then be collected and recycled into new paper.

**RCRA** - Resource Conservation and Recovery Act, 42 U.S.C. Sections 6901 - 6992(k); 40 CFR Parts 148, 240-299. This law regulates solid and hazardous waste and includes underground storage tanks, medical waste, and recycling requirements.

Attachment 3-9



<p style="text-align: center;"><b>Table 1</b> <b>GENERAL REQUIREMENTS OF EXECUTIVE ORDER 12856</b></p>
<p style="text-align: center;"><b>Requirements</b></p>
<p><b>Pollution Prevention Strategies:</b> Federal agencies must develop written pollution prevention strategies by August 1994. Each federal agency strategy must include a pollution prevention policy statement incorporating source reduction in facility management and acquisition programs, outline plans for compliance with the requirements of the Executive Order, and designate an individual responsible for coordinating pollution prevention efforts.</p>
<p><b>Reduction in Releases of Toxic Chemicals:</b> Federal agencies with facilities meeting the toxic-release inventory (TRI) reporting requirements must develop goals for reducing their total cumulative releases and offsite transfers of TRI chemicals from such facilities by 50 percent by the end of 1999. To the extent practicable, such reductions should be achieved by source reduction practices rather than other strategies, such as recycling and treatment.</p>
<p><b>Facility Pollution Prevention Plans:</b> Federal facilities must develop pollution prevention plans by the end of 1995. The plans should include a detailed assessment of waste generation, an analysis of pollution prevention opportunities and options, and procedures for implementing and evaluating pollution prevention measures.</p>
<p><b>Procurement Procedures:</b> Each federal agency must establish a plan and goals for eliminating or reducing the unnecessary acquisition of products containing extremely hazardous substances or toxic chemicals. The plan should encompass products that the federal agency manufactures, processes, or uses.</p>
<p><b>Specifications, Product Descriptions, and Standards:</b> Each federal agency must review its specifications and standards and identify opportunities for eliminating or reducing acquisition and procurement of extremely hazardous substances or toxic chemicals. The review of specifications and standards must be conducted by August 3, 1995, and appropriate revisions of the specifications and standards must be completed by 1999.</p>
<p><b>Toxic Chemicals Reporting:</b> Federal facilities that manufacture, process, or use toxic chemicals are required to report publicly the quantities of use, storage, and releases under the Emergency Planning and Community Right-to-Know Act (EPCRA). Various reporting deadlines pertain to the different sections of EPCRA. The first of the TRI reports is due on or before July 1, 1995, covering the 1994 calendar year.</p>

<p><b>Table 2</b>  <b>APPLICABILITY AND REQUIREMENTS FOR FEDERAL AGENCIES AND FACILITIES UNDER EXECUTIVE ORDER 12856</b></p>		
<b>EO Section</b>	<b>Applicability</b>	<b>Requirement</b>
<b>Toxic Chemical Reduction Goals (Section 3-302)</b>	All federal agencies that have facilities with 10 or more full-time employees and that manufacture, import, or process 25,000 lbs or use 10,000 lbs of a listed toxic chemical annually. <sup>1</sup>	C Achieve a 50 percent reduction in the releases of toxic chemicals from the facilities on an agencywide basis by December 31, 1999.
<b>Facility Pollution Prevention Plans (Section 3-302)</b>	Federal facilities that meet any of the reporting thresholds for EPCRA 302, 311-312, and 313 (see b).	C Prepare a written facility-specific pollution prevention plan by December 31, 1995.
<b>Acquisition and Procurement Goals (Section 3-303)</b>	All DOI operations as necessary.	<p>C Establish plans and goals for eliminating or reducing the unnecessary acquisition of products containing extremely hazardous substances (EHS) or listed toxic chemicals by August 3, 1994.</p> <p>C Review standardized department specifications to identify opportunities for eliminating or reducing the use of products containing EHS or listed toxic chemicals by August 3, 1995.</p> <p>C Review federal acquisition regulations (FAR) for pollution prevention opportunities and present recommendations for changes to the Civilian Agency Acquisition Council by August 3, 1995.</p>
<b>EPCRA 313 and PPA Reporting (Section 3-304)</b>	Federal facilities that have 10 or more full-time employees and that manufacture, import, or process 25,000 lbs or use 10,000 lbs of a listed toxic chemical. <sup>1</sup>	C Submit annual toxic-release inventory reports and toxic-chemical source reduction and recycling reports to EPA and the appropriate state or tribal government, beginning July 1, 1995 for the 1994 calendar year.
<b>EPCRA 302 Reporting (Section 3-305)</b>	Federal facilities that store or have present at any time EHS above the threshold planning quantity (TPQ). <sup>2</sup>	<p>C Notify state emergency response commissions (SERCs) and local emergency planning committees (LEPCs) of all EHSs above TPQs by March 3, 1994.</p> <p>C Designate a facility coordinator to work with LEPCs to generate emergency response plans by August 3, 1994.</p> <p>EPCRA 304 Reporting (Section 3-305) Federal facilities that produce, use, or store an EHS or a</p>

C  
E  
R  
C  
L  
A

<b>Table 2</b> <b>APPLICABILITY AND REQUIREMENTS FOR FEDERAL AGENCIES AND FACILITIES UNDER EXECUTIVE ORDER 12856</b>		
<b>EO Section</b>	<b>Applicability</b>	<b>Requirement</b>
		<div>h</div> <div>a</div> <div>z</div> <div>a</div> <div>r</div> <div>d</div> <div>o</div> <div>u</div> <div>s</div> <div>s</div> <div>u</div> <div>b</div> <div>s</div> <div>t</div> <div>a</div> <div>n</div> <div>c</div> <div>e</div> <div>a</div> <div>n</div> <div>d</div> <div>h</div> <div>a</div> <div>v</div> <div>e</div> <div>a</div> <div>n</div> <div>o</div> <div>f</div>

<b>Table 2</b> <b>APPLICABILITY AND REQUIREMENTS FOR FEDERAL AGENCIES AND FACILITIES UNDER EXECUTIVE ORDER 12856</b>		
<b>EO Section</b>	<b>Applicability</b>	<b>Requirement</b>
		f s i t e  r e l e a s e  o f a n  E H S  o r  a  C E R C L A

<b>Table 2</b> <b>APPLICABILITY AND REQUIREMENTS FOR FEDERAL AGENCIES AND FACILITIES UNDER EXECUTIVE ORDER 12856</b>		
<b>EO Section</b>	<b>Applicability</b>	<b>Requirement</b>
		h a z a r d o u s  s u b s t a n c e  a t o r  a b o v e  t h e

**Table 2**  
**APPLICABILITY AND REQUIREMENTS FOR FEDERAL AGENCIES AND FACILITIES UNDER EXECUTIVE ORDER 12856**

EO Section	Applicability	Requirement
		<div> <div>r</div> <div>e</div> <div>p</div> <div>o</div> <div>r</div> <div>t</div> <div>a</div> <div>b</div> <div>l</div> <div>e</div> <div> </div> <div>q</div> <div>u</div> <div>a</div> <div>n</div> <div>t</div> <div>i</div> <div>t</div> <div>y</div> <div> </div> <div>(</div> <div>R</div> <div>Q</div> <div>)</div> <div> </div> <div>:</div> <div>3</div> </div>
<b>EPCRA 311-312 Reporting (Section 3-305)</b>	<b>Federal facilities that store or have present at any time a hazardous chemical at or above 10,000 lbs or an EHS at or above 500 lbs or the TPQ, whichever is less.<sup>4</sup></b>	<div> <div>C</div> <div>Submit copies or a listing of material safety data sheets (MSDS) for each subject chemical to the SERC, LEPC, and local fire department by August 3, 1994.</div> <div>C</div> <div>Annually prepare and submit an ``Emergency and Hazardous Chemical Inventory'' report to the SERC, the LEPC, and the local fire department beginning March 1, 1995, for the 1994 calendar year.</div> </div>

<b>Table 2</b> <b>APPLICABILITY AND REQUIREMENTS FOR FEDERAL AGENCIES AND FACILITIES UNDER EXECUTIVE ORDER 12856</b>		
<b>EO Section</b>	<b>Applicability</b>	<b>Requirement</b>
<b>Notes:</b> <sup>1</sup> Listed toxic chemicals applicable to toxic chemical reduction goals, EPCRA 313, and Pollution Prevention Act 6607 are identified in 40 CFR 372.65. <sup>2</sup> EHSs applicable to EPCRA 302, along with their TPQs, are identified in 40 CFR 355 Appendix A. <sup>3</sup> EHSs and CERCLA hazardous substances applicable to EPCRA 304, along with their RQs, are identified in 40 CFR 355 Appendix A (EHSs) and 40 CFR 302.4 (CERCLA hazardous substances). <sup>4</sup> Hazardous chemicals applicable to EPCRA 311-312 consist of all chemicals for which MSDSs must be developed under Occupational Safety and Health Act Hazard Communication Standards and are identified by broad criteria rather than enumeration.		

**Table 3**  
**EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA)**  
**AND POLLUTION PREVENTION ACT (PPA) APPLICABILITY GUIDANCE**

Type of Facility or Primary Mission	Possible Chemical Products Used	Potential Threshold Quantities <sup>a</sup>		
		EPCRA 302 (lbs stored)	EPCRA 311-312 (lbs onsite)	EPCRA 313 PPA 6607 (lbs/yr)
Office Building	None likely (Substances present in the same form as a product packaged for distribution and use by the general public are exempt from EPCRA 311-312.)	NA	(exempt)	NA
Storage (various products)	gasoline (regular unleaded) <sup>b</sup>	NA	10,000	170,000 <sup>d</sup>
	jet fuels (JP-4) <sup>b</sup>	NA	10,000	700,000 <sup>d</sup>
	kerosene, diesel No. 1, diesel No. 2, jet fuel (JP-5, JP-7, and JP-8) <sup>c</sup>	NA	10,000	NA
	antifreeze	NA	10,000	10,000 <sup>d</sup>
	solvents	NA	10,000	10,000 <sup>d</sup>
	paints	NA	10,000	10,000 <sup>d</sup>
	pesticides	500	500	10,000 <sup>d</sup>
	herbicides	500	500	10,000 <sup>d</sup>
Maintenance (engine/vehicle)	gasoline (regular unleaded) <sup>b</sup>	NA	10,000	170,000
	jet fuels (JP-4) <sup>b</sup>	NA	10,000	700,000
	kerosene, diesel No. 1, diesel No. 2, jet fuel (JP-5, JP-7, and JP-8) <sup>c</sup>	NA	10,000	NA
	antifreeze	NA	10,000	10,000
	solvents	NA	10,000	10,000
	paints	NA	10,000	10,000
	acids, caustics	1,000	500	10,000
Maintenance (roads and structures)	gasoline (regular unleaded) <sup>b</sup>	NA	10,000	170,000
	diesel <sup>b</sup>	NA	10,000	NA
	paints	NA	10,000	10,000
	solvents, paint thinners	NA	10,000	10,000
	pesticides	500	500	10,000
Maintenance (grounds)	gasoline (regular unleaded) <sup>b</sup>	NA	10,000	170,000
	pesticides	500	500	10,000
	herbicides	500	500	10,000
				Research Laboratory Various chemicals (Chemicals used directly in a



**Table 3**  
**EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA)**  
**AND POLLUTION PREVENTION ACT (PPA) APPLICABILITY GUIDANCE**

Type of Facility or Primary Mission	Possible Chemical Products Used	Potential Threshold Quantities <sup>a</sup>		
		EPCRA 302 (lbs stored)	EPCRA 311-312 (lbs onsite)	EPCRA 313 PPA 6607 (lbs/yr)
				laboratory activity are exempt from EPCRA 311-312 and 313.)§ 10 <sup>c</sup> (exempt)(exempt)
Printing, Copying	Ammonia	500	500	10,000
<p>NA - Not Applicable: The types of chemical compounds likely to be found in these chemical products do not include those listed under this section of EPCRA.</p> <p><sup>a</sup>500 lbs of a substance is roughly equivalent to 55 gallons; 10,000 lbs is roughly equivalent to 1,000 gallons.</p> <p><sup>b</sup>Gasoline and JP-4 contain small quantities of benzene, toluene, ethylbenzene, and xylenes (BTEX), which are hazardous chemicals and listed toxic chemicals. The potential threshold quantities shown for these products is roughly equivalent to 10,000 lbs of toluene, which typically is the most abundant of the BTEX compounds. Average percent-weight concentrations of toluene in typical fuel samples are gasoline - 6.4%, JP-4 - 3.2%. Average densities are gasoline - 7.30 lbs/gal, JP-4 - 6.37 lbs/gal.</p> <p><sup>c</sup>Kerosene, diesel No. 2, JP-7, and JP-8 contain small quantities of polycyclic aromatic hydrocarbons (PAHs), many of which are hazardous chemicals and listed toxic chemicals. Naphthalene is typically the most abundant of the PAH compounds. Average percent-weight concentrations of naphthalene in typical fuel samples are less than 1%. EPA provides an exemption from TRI reporting for listed toxic chemicals that are present in a product at a concentration of less than 1%.</p> <p><sup>d</sup>Facilities that are used strictly for storing listed toxic chemicals (warehouses) are exempt from EPCRA 313 reporting requirements because the chemicals do not fit the definition of being manufactured, processed, or used at the facility.</p> <p><sup>e</sup>EPCRA 302 reporting threshold quantities for some compounds may be as low as 10 lbs.</p>				



## **EPA Program Hotline Telephone Numbers**

**The following EPA Hotlines can answer questions about regulations and rules, and order documentation.**

<b>RCRA/Superfund</b>	<b>1-800-424-9346</b>
<b>Solid Waste</b>	<b>1-800-424-9346</b>
<b>Underground Storage Tanks</b>	<b>1-800-424-9346</b>
<b>Emergency Planning and Community Right-To-Know</b>	<b>1-800-535-0202</b>
<b>Oil Pollution Act/SPCC</b>	<b>1-202-260-2342</b>
<b>Groundwater Protection</b>	<b>1-800-426-4791</b>
<b>Safe Drinking Water</b>	<b>1-800-426-4791</b>
<b>Wetlands Protection</b>	<b>1-800-832-7828</b>
<b>Toxic Substances Control Act &amp; Asbestos</b>	<b>1-202-554-1404</b>
<b>Storm Water, NPDES Permitting</b>	<b>1-703-821-4823</b>
<b>Indoor Air Quality</b>	<b>1-800-438-4318</b>
<b>Acid Rain</b>	<b>1-202-233-9620</b>
<b>Stratospheric Ozone</b>	<b>1-800-296-1966</b>
<b>Greenlights</b>	<b>1-202-775-6650</b>
<b>Air Risk Information Support Center</b>	<b>1-919-541-0888</b>